

**CIVIL ACTION NUMBER:
2:18-cv-01754-JHE**

Task	Deadline
Discovery	October 31, 2019
Dispositive Motions	December 2, 2019
Pretrial Conference	January 2020 (to be set by separate order)
Ready for Trial	February 2020 (to be set by separate order)

3. Although the parties have engaged in preliminary discovery, the parties have not yet completed written discovery or completed depositions in this matter, in part, because the parties are evaluating whether this matter can be resolved.

4. The undersigned Plaintiff's counsel also is sole counsel in the matter of *Richard Mauro v. RCF, LLC*, Case No. 5:16-cv-01617-MHH, set for pre-trial and trial with dates to be determined. Additionally, undersigned Plaintiff's counsel is lead counsel for the plaintiffs in the matter of *Jacqueline Cooley v. HMR of Alabama, Inc.* 4:16-cv-01432-ACA, which is due to begin depositions for approximately forty-three plaintiffs and an equal or greater number of Defendant's witnesses.

5. Accordingly, the parties request that the Court extend the applicable deadlines as noted below, by approximately one hundred twenty (120) days, to allow time for Defendant to obtain the necessary records to conduct a thorough examination of Plaintiff at deposition.

Task	Proposed New Deadline
Discovery	February 28, 2020
Dispositive Motions	April 13, 2020
Pretrial Conference	May 2020 (to be set by separate order)
Ready for Trial	June 2020 (to be set by separate order)

6. This extension is not sought merely for delay but so that justice may be served.

7. The parties further requests that the Court award them any further and additional relief to which it may be justly entitled.

Respectfully Submitted,

/s/ Allen D. Arnold

/s/ Michael L. Thompson

Allen D. Arnold, Esq.
A Member of the Five Points Law
Group, LLC
2151 Highland Avenue, Suite 205
Birmingham, AL 35205
(205) 252-1550
Email: allen@5pointslaw.com
Counsel for Plaintiff

Michael L. Thompson, Esq.
ASB-5417-O46M
Lehr Middlebrooks Vreeland &
Thompson, PC
P. O. Box 11945
Birmingham, AL 35202-1945
(205) 326-3002
Email:
mthompson@lehrmidthlbrooks.com
Counsel for Defendant

656938.docx